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RECEIVED
MAR 17 1997
Federal Communications Commission
Office of Secretary

March 17, 1997

BY HAND DELIVERY
Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: Comments of Metro Broadcasters - Texas, Inc.
MM Docket No. 97-26; RM-8968
Detroit, Texas

Dear Mr. Caton:

Transmitted herewith on behalf of Metro Broadcasters-Texas, Inc., are an original and four copies of its Comments and Counterproposal in the above-captioned proceeding in support of the allotment of Channel 238C2, 238C3 or 238A to Detroit, Texas, in lieu of Channel 294C2.

Should any questions arise concerning these comments, please communicate directly with this office.

Very truly yours,

Andrew S. Kersting
Counsel for
Metro Broadcasters-Texas, Inc.

Enclosures
cc (w/ encl.): Certificate of Service

No. of Copies rec'd 0+4
List A B C D E

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b),	)	MM Docket No. 97-26
FM Table of Allotments,	)	RM No. 8968
FM Broadcast Stations	)	
(Detroit, Texas)	)	

To: Chief, Allocations Branch

COMMENTS AND COUNTERPROPOSAL

Metro Broadcasters-Texas, Inc. ("Metro"), licensee of Station KHYI(FM), Howe, Texas, by counsel, hereby submits its comments and counterproposal in response to the Commission's *Notice of Proposed Rule Making*, DA 97-114 (released January 24, 1997) ("*Notice*"), in the above-captioned proceeding. As set forth below, Metro respectfully requests that the following change be made to Section 73.202(b) of the Commission's rules in lieu of the change proposed in the *Notice*:

	Channel No.	
City	**Present**	**Proposed**
Detroit, Texas	- - -	238C2 or 238C3 or 238A
Howe, Texas	237C3	237C2
Hugo, Oklahoma	238C2	294C2

Great Plains Radiocasting currently has a proposal pending at the Commission to amend the FM Table of Allotments by allotting Channel 294C2 to Detroit, Texas. This allotment can be accomplished in accordance with the Commission's rules and would provide the community of Detroit with its first local aural transmission service. Nevertheless, Metro proposes, instead, that the

Commission (i) allot either Channel 238C2, 238C3, or 238A to Detroit, Texas, (ii) substitute Channel 294C2 for Channel 238C2 at Hugo, Oklahoma, and (iii) modify the license of Station KHYI, Howe, Texas, to specify operation on Channel 237C2 in lieu of Channel 237C3. In support of this request, the following is stated:

As demonstrated in the attached engineering exhibit, from an assumed transmitter site at the specified reference coordinates, there is an open area where Station KHYI's transmitter may be located that meets the minimum separation requirements with respect to all known licenses, construction permits, open allotments, pending applications, and pending rulemakings.[1] The specified transmitter reference coordinates are located only 2.70 kilometers south-southwest of Howe which will enable Station KHYI to provide a city-grade signal to its community of license.

As also demonstrated in the attached engineering exhibit, Channel 238 can be allotted at Detroit in lieu of Channel 294C2 as either a Class C2, C3, or A facility, and will not conflict with Metro's proposal to upgrade Channel 237C3 at Howe to Class C2. The pending rulemaking petition seeking the allotment of Channel 294C2 at Detroit, Texas, specifies a site restriction of 22 kilometers northwest of the community in order to avoid a short-spacing to Station KWSK(FM), Daingerfield, Texas. As shown in the attached engineering exhibit, however, Channel 238 can be allotted to Detroit as a Class C2 facility with a site restriction of only 7.68 kilometers east of the community's reference coordinates. Alternatively, Channel 238 can be allotted to Detroit at its center-city reference coordinates as either a Class C3 or A facility. Metro respectfully submits that because

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[1] Although the proposed allotment of Channel 237C2 at Howe was short-spaced to a proposal to allot Channel 237A at Jacksboro, Texas, the Commission has allotted Channel 299A at Jacksboro in lieu of Channel 237A, which meets the minimum separation requirements. *See Report and Order*, DA 96-2210 (released January 17, 1997).

Detroit has a 1990 Census population of only 706 persons, the allotment of a Class C2 facility is not necessary to provide adequate service to that community.[2]

As indicated above, the instant proposal also seeks to substitute Channel 294C2 for the existing allotment of Channel 238C2 at Hugo, Oklahoma, upon which Station KITX(FM) is currently operating. The Commission has repeatedly held that the substitution of an existing station's channel serves the public interest where the substitution permits the provision of a new or expanded service at another community. *See Coleman, Sebewaing and Tuscola, Michigan*, 11 FCC Rcd 11286, 11287-88 (Chief, Allocations Branch 1996), citing *Marietta, Ohio and Ravenswood, West Virginia*, 2 FCC Rcd 4681 (Chief, Allocations Branch 1987); *Albany, New York et al.*, 2 FCC Rcd 4300 (Chief, Policy and Rules Div. 1987).

The attached engineering exhibit establishes that a grant of the alternative Channel 238C2 counterproposal would serve the public interest because it would bring a new service to a greater number of people in the Detroit area than the proposal set forth in the *Notice*. Indeed, the 1 mV/m contour of the proposal set forth in the *Notice* encompasses 87,304 persons within an area of 8,577.3 square kilometers (sq. km). The 1 mV/m contour of the alternative counterproposal to allot Channel 238C2 at Detroit would cover 96,272 persons in an area consisting of 8,559.8 sq. km. *See* Engineering Statement, p. 2. Moreover, although the pending proposal would provide a fifth service to a narrow area encompassing approximately 170 persons and 12.9 sq. km, the instant

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[2] In contrast, the city of Howe, Texas, is an incorporated community with a 1990 U.S. Census population of 2,173. Howe has its own post office and zip code, as well as at least one bank. *Rand McNally Commercial Atlas & Marketing Guide*, p. 529 (127th ed. 1996).

counterproposal would provide a fifth service to three separate areas covering 640 persons within a total area of 83.1 sq. km.[3] *Id.* at 2-3.

Furthermore, the proposed modification of the allotment of Channel 237C3 to Channel 237C2 at Howe would enable Station KHYI to increase its 1 mV/m (60 dBu) contour, which presently covers a population of 254,212 persons and an area of 4,856.1 sq. km., to cover a population of 392,186 persons encompassing an area of 8,486.4 sq. km. This increase represents a gain of 137,974 persons and an area of 3,630.3 sq. km. There is no loss area from the proposed reference point.

In the event this counterproposal is granted and the FM Table of Allotments is amended to substitute Channel 237C2 for Channel 237C3 at Howe, Texas, Metro will file an application for a construction permit for the Class C2 facility, and, upon grant of its application, promptly construct the new facility.

WHEREFORE, in light of the foregoing, Metro Broadcasters-Texas, Inc. respectfully requests the Commission to GRANT this counterproposal, AMEND the FM Table of Allotments in accordance herewith, and MODIFY the license of Station KHYI, Howe, Texas, to specify operation on Channel 237C2 in lieu of Channel 237C3.

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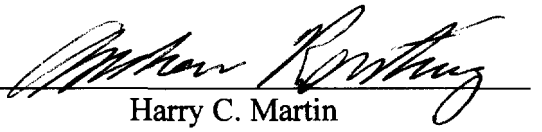
[3] The Commission has long considered an area receiving five aural services to be well-served. *See, e.g., Georgetown and Millsboro, Delaware*, 11 FCC Rcd 14445, 14446 (Chief, Allocations Branch 1996); *Geneseo, Illinois and DeWitt, Iowa*, 11 FCC Rcd 11575, 11577 n. 4 (Chief, Allocations Branch 1996).

Respectfully submitted,

METRO BROADCASTERS-TEXAS, INC.

By: 
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March 17, 1997

c:\...martin\rm\howe.tx

ENGINEERING REPORT

Counter-Proposal to MM Doc. 97-26
For
Detroit, TX - Howe, TX - Hugo, OK

March 1997

E. Harold Munn, Jr. & Associates, Inc.
Broadcast Engineering Consultants
Coldwater, MI 49036

ENGINEERING STATEMENT

In Support of a Counter-Proposal To MM Docket No. 97-26

The firm of E. Harold Munn, Jr. & Associates, Inc., was retained to prepare this Engineering Statement in support of a counter-proposal to MM Docket No. 97-26 (RM-8968) to amend 47 C.F.R. Section 73.202(b), the FM Table of Allotments.

It is proposed to amend the Table to modify Channel 237C3, 95.3 MHz at Howe, Texas to Class C2 designation and reserve the channel for use by KHYI. A special reference point meeting the spacings of §73.207(b)(1)(2) is specified at NL 33°29'27"; WL 96°37'32". This special reference point is located 2.70 km to the south-southwest of the Howe, TX city reference point. A open area exists where a transmitter site may be located and provide 3.16 mV/m city grade service.

In addition, it proposed to change the Table of Allotments to substitute Channel 294C2 for Channel 238C2 at Hugo, Oklahoma, reserving this allocation for KITX. This would be a counter-proposal to MM Docket No. 97-26 (RM-8968) to add Channel 294C2 to Detroit, Texas. However, as shown below, Channel 238 can be used at Detroit either as a Class C2, C3 or A facility and not conflict with KHYI's Class C2 upgrade on Channel 237.

Employing a different special reference point at NL 33°39'32"; WL 95°11'00", Channel 238C2 can be allocated to Detroit rather than 294C2. This reference point is only 7.68 kilometers to the east of the city reference point. The proposal for Channel 294C2 is site restricted to 22 kilometers northwest of Detroit. Alternatively, this proposal would work from the Detroit city reference point as Channel 238C3 or Channel 238A. Due to the extremely small population of 706 persons from the 1990 Census in Detroit, TX, there is a question regarding whether a Class C2 channel is needed to serve that community.

Data contained in this report is responsive to the requirements of the Rules, as amended.

Figure 1 is a tabulation of present spacings from the city reference point. This tabulation shows a short-spacing to a proposal to add Channel 237A to Jacksboro, TX. RM-8799 has been adopted which added Channel 299A instead of Channel 237A. With the additional proposal to modify KITX, Hugo, OK, from Channel 238C2 to Channel 294C2, the reference point is fully spaced. Figure 2 is a pertinent portion of the computer study which demonstrates that, at the Howe, TX city reference point listed, and for the class of station proposed, all the required separations are fully met for the proposed allotment of Channel 237C2. Figure 3 shows a computer

plot of the proposed FM transmitter open area for Channel 237C2 at Howe, TX.

Figure 4 is a tabulation of the pertinent portion of the computer study which demonstrates that Channel 294C2 meets all the spacings from the present KITX, Hugo, OK transmitter site. Channel 238C2 will be deleted from that community.

Figure 5 is a tabulation of the pertinent portion of the computer study which demonstrates that Channel 238C2 meets all the spacings from a special reference point for Detroit, TX.

Figure 6 is a tabulation of the pertinent portion of the computer study which demonstrates that Channel 238C3 meets all the spacings from the Detroit, TX city reference point.

Figure 7 is a tabulation of the pertinent portion of the computer study which demonstrates that Channel 238A meets all the spacings from the Detroit, TX city reference point.

Figure 8 is a map showing the 1 mV/m contour of the Detroit, TX allocation as proposed in RM-8968 on Channel 238C2 versus the same contour from this counter-proposal on Channel 294C2. The population in the 1 mV/m contour of RM-8968 would encompass 87,304 persons in an area of 8,577.3 Sq. Km. This counter-proposal's 1 mV/m contour would cover 96,272 persons in an area of 8,559.8 Sq. Km.

In addition to this showing, a study was made of the number of aural broadcast services existing in the proposed RM-8968 1 mV/m contour versus the 1 mV/m contour of this counter-proposal. Figure 9 is a map showing the 1 mV/m contour of RM-8968 and a depiction of the other AM and FM services provided to the area. Figure 10 is a tabulation of the stations shown in Figure 9. There is one area, on the northeast edge of the contour that has only 4 existing aural broadcast services. The proposal in RM-8968 would provide the 5th service to this area. Five aural broadcast services are considered adequate for any area in the country. Based on uniform distribution of population within each minor civil division in the 1990 Census data, 170 persons would be receiving this 5th service. The area that is delineated by this 5th service covers 12.9 Sq. Km.

Figure 11 is a map depicting the aural broadcast services to the 1 mV/m contour in this counter-proposal. Figure 12 is a

tabulation of the pertinent stations that provide service to this contour area. Figure 11 shows that, again, the least amount of existing services to any area within the 1 mV/m contour is four (4). However, there are three separate areas where this occurs. The total population in the three areas where the counter-proposal will become the 5th aural broadcast service is 640 persons. These three areas cover a total of 83.1 Sq. Km. Note that some stations providing service, without eliminating gray area, have been omitted for improved map definition.

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM and FM stations. The accuracy of the results of this study are understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities which may be inoperative, construction permit facilities which may now be operating under program test authority (but have not yet been issued a license), facilities which may have been licensed since the last monthly update, or non-commercial stations operating either in the AM band or within the commercial portion of the FM band. Therefore, it is possible that some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known non-commercially licensed stations, as well as application and construction permit facilities, have been eliminated from consideration in this study. For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 0.5 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 1.0 mV/m (60 dBu) contour as provided in §73.313 of the Rules. The predicted FM contours shown in this report are based on the use of 36 equally spaced terrain radials beginning with 0° True.

Figure 13 is a map showing the present licensed coverage of KHYI versus proposed maximum Class C2 facilities from the special reference point. The present 1 mV/m (60 dBu) contour covers a population of 254,212 persons and an area of 4,856.1 Sq. Km. The proposed 1 mV/m (60 dBu) contour covers 392,186 persons and an area of 8,486.4 Sq. Km. From the proposed special reference point, there is a gain area with a population of 137,974 persons encompassing an area of 3,630.3 Sq. Km. There is no loss area from the proposed special reference point.

In Support of a Counter-Proposal To MM Docket No. 97-26

It is requested that 47 C.F.R.§73.202(b) be amended as follows.

CITY, STATE	PRESENT	PROPOSED
Detroit, TX	---	238C2 or 238C3 or 238A
Howe, TX	237C3	237C2
Hugo, OK	238C2	294C2

CERTIFICATION

This Engineering Statement was prepared by the undersigned, a member of the staff of E. Harold Munn, Jr. & Associates, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan 49036-0220.

I hereby certify the contents of this Engineering Statement to be true and accurate to the best of my knowledge and belief. My qualifications are a matter of record before the Federal Communications Commission.

Dated this 12th day of March, 1997 by Wayne S. Reese

Wayne S. Reese, President

E. Harold Munn, Jr. & Associates, Inc.
P. O. Box 220
Coldwater, MI 49036-0220

Phone: (517) 278-7339
Fax: (517) 278-6973

FIGURE 1

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

Proposed Class C2 Allocation Before Changes
KHYI - HOWE TEXAS Special Reference Point

REFERENCE
33 29 27 N
96 37 32 W

CLASS = C2
Current Spacings
Channel 237 - 95.3 MHz

DISPLAY DATES
DATA 01-31-97
SEARCH 02-06-97

Call	Channel	Location		Dist	Azi	FCC	Margin
N. Lat.	W. Lng.		Power		HAAT		
KHYI	LI	237C3	Howe	TX	10.88	166.9	177.0	-166.12
33 23 43	96 35 56	CN	16.000 kW		126 M		
Metro Broadcasters-Texas, Inc				BLH940429KA		941118	
KHYI.C	CP	237C3	Howe	TX	10.92	166.1	177.0	-166.08
33 23 43	96 35 50	CN	10.500 kW		156 M		
Metro Broadcasters-Texas, Inc				BPH960703IA		961017	
AD237	AD	237A	Jacksboro	TX	146.29	258.4	166.0	-19.71
33 13 06	98 09 48		0.000 kW		0 M		
Heftel Broadcasting Corp.				RM8854		960812	
KITX	LI	238C2	Hugo	OK	117.22	65.9	130.0	-12.78
33 54 56	95 28 04	CN	50.000 kW		150 M		
BP Communications, Inc.				BLH890828KC		960930	
KWRDFM	LI	235C	Arlington	TX	105.00	197.8	105.0	0.00
32 35 22	96 58 10	CY	100.000 kW		460 M		
Inspiration Media of Texas, I				BLH910506KF		970127	
KKAJFM	LI	239C1	Ardmore	OK	84.86	322.9	79.0	5.86
34 05 56	97 10 54	CN	100.000 kW		137 M		
Chuckie Broadcasting Company				BLH6267		961218	
KABH.A	AP	236C	Shawnee	OK	197.89	6.5	188.0	9.89
35 15 47	96 22 43	CN	100.000 kW		306 M		
Bott Broadcasting Company				BMPH951106IB		961018	
KFROFM	LI	237C3	Gilmer	TX	187.63	120.2	177.0	10.63
32 37 50	94 53 44	ZCN	5.900 kW		203 M		
Curtis Broadcasting Stations,				BLH950814KG		960426	
KABH.C	CP	236C	Shawnee	OK	199.82	6.8	188.0	11.82
35 16 45	96 21 53	CN	100.000 kW		524 M		
Bott Broadcasting Company				BPH851028MG		960801	
KMGZ.C	CP	237C3	Lawton	OK	208.99	305.8	177.0	31.99
34 34 36	98 28 30	ZCN	14.000 kW		95 M		
Broadco of Texas, Inc.				BPH960111LG		960617	
KCKR	LI	238C	Waco	TX	224.42	193.4	188.0	36.42
31 31 16	97 10 26	CN	4.800 kW		55 M		
Gulfstar Communications Waco				BLH961009KE		970113	
KMGZ.C	CP	237A	Lawton	OK	208.99	305.8	166.0	42.99
34 34 36	98 28 30	CN	6.000 kW		92 M		
Broadco of Texas, Inc.				BPH890511MH		960212	
KDXE	LI	240A	Sulphur Springs	TX	102.34	111.4	55.0	47.34
33 09 07	95 36 12	CN	6.000 kW		87 M		
Gilbert Group, Inc.				BMLH910214KA		960904	

FIGURE 2

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

Proposed Class C2 Allocation After Changes
KHYI - HOWE TEXAS Special Reference Point

REFERENCE
33 29 27 N
96 37 32 W

CLASS = C2
Current Spacings

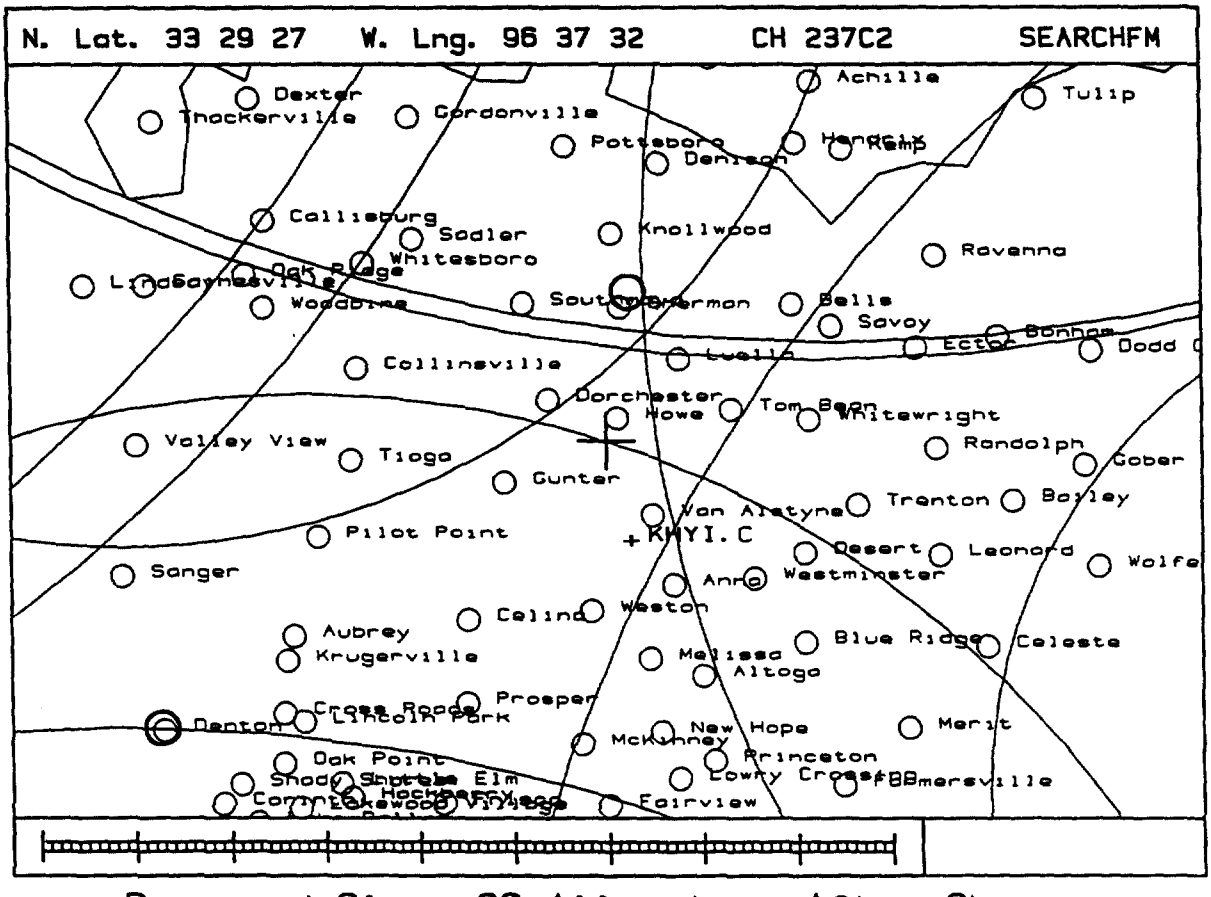
DISPLAY DATES
DATA 01-31-97
SEARCH 02-06-97

Channel 237 - 95.3 MHz

Call / N. Lat.	Channel / W. Lng.	Location		Power	Dist	Azi	FCC HAAT	Margin
KHYI	LI 237C3	Howe	TX	16.000 kW	10.88	166.9	177.0	-166.12
33 23 43	96 35 56	CN		126 M				
Metro Broadcasters-Texas, Inc				BLH940429KA		941118		
KHYI.C CP	237C3	Howe	TX	10.500 kW	10.92	166.1	177.0	-166.08
33 23 43	96 35 50	CN		156 M				
Metro Broadcasters-Texas, Inc				BPH960703IA		961017		
KWRDFM LI	235C	Arlington	TX	100.000 kW	105.00	197.8	105.0	0.00
32 35 22	96 58 10	CY		460 M				
Inspiration Media of Texas, I				BLH910506KF		970127		
AD238 AD	238C2	Detroit	TX	0.000 kW	135.19	81.6	130.0	5.19
33 39 32	95 11 00			0 M				
Metro Broadcasters-Texas, Inc				RM8968		970127		
Site Restriction 7.68km east								
KKAJFM LI	239C1	Ardmore	OK	100.000 kW	84.86	322.9	79.0	5.86
34 05 56	97 10 54	CN		137 M				
Chuckie Broadcasting Company				BLH6267		961218		
KABH.A AP	236C	Shawnee	OK	100.000 kW	197.89	6.5	188.0	9.89
35 15 47	96 22 43	CN		306 M				
Bott Broadcasting Company				BMPH951106IB		961018		
amended 961017								
KFROFM LI	237C3	Gilmer	TX	5.900 kW	187.63	120.2	177.0	10.63
32 37 50	94 53 44	ZCN		203 M				
Curtis Broadcasting Stations,				BLH950814KG		960426		
KABH.C CP	236C	Shawnee	OK	100.000 kW	199.82	6.8	188.0	11.82
35 16 45	96 21 53	CN		524 M				
Bott Broadcasting Company				BPH851028MG		960801		
KMGZ.C CP	237C3	Lawton	OK	14.000 kW	208.99	305.8	177.0	31.99
34 34 36	98 28 30	ZCN		95 M				
Broadco of Texas, Inc.				BPH960111LG		960617		
One-Step Application from Channel 237A								
KCKR LI	238C	Waco	TX	4.800 kW	224.42	193.4	188.0	36.42
31 31 16	97 10 26	CN		55 M				
Gulfstar Communications Waco				BLH961009KE		970113		
For Auxiliary Purposes Only								
KMGZ.C CP	237A	Lawton	OK	6.000 kW	208.99	305.8	166.0	42.99
34 34 36	98 28 30	CN		92 M				
Broadco of Texas, Inc.				BPH890511MH		960212		
*To Channel 237C3 per One-Step Application BPH-960111LG								
KDXE LI	240A	Sulphur Springs	TX	6.000 kW	102.34	111.4	55.0	47.34
33 09 07	95 36 12	CN		87 M				
Gilbert Group, Inc.				BMLH910214KA		960904		

FIGURE 3

E. Harold Munn Jr. & Associates Inc. P.O. Box 220 - Coldwater MI 49036



Proposed Class C2 Allocation After Changes
KHYI - HOWE TEXAS Special Reference Point

Call	CH#	Location		D-KM	Azi	FCC	Margin
KHYI	237C3	Howe	TX	10.88	166.9	177.0	-166.12
KHYI.C	237C3	Howe	TX	10.92	166.1	177.0	-166.08
KWRDFM	235C	Arlington	TX	105.00	197.8	105.0	0.00
AD238	238C2	Detroit	TX	135.19	81.6	130.0	5.19
KKAJFM	239C1	Ardmore	OK	84.86	322.9	79.0	5.86
KABH.A	236C	Shawnee	OK	197.89	6.5	188.0	9.89
KFRDFM	237C3	Gilmer	TX	187.63	120.2	177.0	10.63
KABH.C	236C	Shawnee	OK	199.82	6.8	188.0	11.82
KMGZ.C	237C3	Lawton	OK	208.99	305.8	177.0	31.99
KCKR	238C	Waco	TX	224.42	193.4	188.0	36.42
KMGZ.C	237A	Lawton	OK	208.99	305.8	166.0	42.99
KDXE	240A	Sulphur Spring	TX	102.34	111.4	55.0	47.34
KCKR	238C	Waco	TX	249.90	195.8	188.0	61.90
KHKS	291C	Denton	TX	105.00	197.8	35.0	70.00
KHKS	291C	Denton	TX	105.03	198.0	35.0	70.03

FIGURE 4

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

Proposed Class C2 Allocation Study
KITX - Hugo Oklahoma Present Site

REFERENCE
33 54 56 N
95 28 04 W

CLASS = C2
Current Spacings
Channel 294 - 106.7 MHz

DISPLAY DATES
DATA 01-24-97
SEARCH 01-30-97

Call	Channel	Location		Dist	Azi	FCC	Margin
N. Lat.	W. Lng.		Power		HAAT		
AD294	AD	294C2	Detroit	TX	12.00	150.9	190.0	-178.00
33 49 16	95 24 16		0.000 kW		0 M		
Great Plains Radiocasting				RM8968		961216	
KYNZ	LI	294A	Lone Grove	OK	168.00	282.8	166.0	2.00
34 14 09	97 14 48	CN	5.500 kW		104 M		
S S S Communications, Inc.				BLH920611KB		920916	
KWSK	LI	295A	Daingerfield	TX	118.01	145.4	106.0	12.01
33 02 20	94 44 54	CN	1.100 kW		156 M		
Robworthton Broadcasting				BLH911007KF		930107	
KKBI	LI	291C2	Broken Bow	OK	73.07	59.6	58.0	15.07
34 14 45	94 46 58	CN	17.000 kW		249 M		
CarePhil Communications				BLH921013KB		940829	
KOOI	LI	293C	Jacksonville	TX	206.16	176.0	188.0	18.16
32 03 40	95 18 50	CN	100.000 kW		447 M		
Waller Broadcasting, Inc.				BLH870416KB		880715	
KCMA.C	CP	293C3	Holdenville	OK	136.11	322.5	117.0	19.11
34 53 03	96 22 35	CN	25.000 kW		99 M		
Hughes County Broadcasting				BPH960923IC		961202	
KRVAFM	LI	295A	Mckinney	TX	127.45	235.6	106.0	21.45
33 15 49	96 35 54	CN	3.900 kW		122 M		
Radio Plano, Inc.				BLH960724KC		961025	
KHTT	LI	295C	Muskogee	OK	217.59	352.9	188.0	29.59
35 51 41	95 46 03	CY	100.000 kW		308 M		
Renda Broadcasting Corporatio				BLH820914AJ		960925	
KCMA.A	AP	293C3	Holdenville	OK	147.18	319.2	117.0	30.18
34 54 50	96 31 20	CN	25.000 kW		100 M		
Tyler Broadcasting Corporatio				BMPH961220IB		970115	
KLBC.A	AP	296A	Durant	OK	88.71	276.5	55.0	33.71
34 00 07	96 25 19	CN	5.100 kW		108 M		
Durant Broadcasting Corporati				BMLH920203KB		961223	
*To Channel 296C2 per D88-48							
KLBC	LI	296A	Durant	OK	88.71	276.5	55.0	33.71
34 00 07	96 25 19	CN	2.000 kW		108 M		
Durant Broadcasting Corporati				BLH880819KF		961223	
KZXB.C	CPM	294C2	Homer	LA	233.69	123.3	190.0	43.69
32 44 39	93 22 53	CN	50.000 kW		140 M		
NWLA Broadcasting Company				BMPH930430IB		961223	
KCMA	LI	293A	Holdenville	OK	151.82	326.9	106.0	45.82
35 03 24	96 22 49	CN	4.500 kW		62 M		
Hughes County Broadcasting				BLH920323KA		961008	
KOMS	LI	297C	Poteau	OK	153.59	40.3	105.0	48.59
34 57 50	94 22 34	CN	100.000 kW		552 M		
Leroy Billy				BLH851015KA		950117	
KMRTFM	LI	294C	Granbury	TX	303.34	233.1	249.0	54.34
32 15 07	98 02 48	CN	100.000 kW		302 M		
KCYT-FM License Corporation				BLH900125KC		961231	

FIGURE 5

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

Alternate Channel - Special Reference Point
Detroit Texas

REFERENCE
33 39 32 N
95 11 00 W

CLASS = C2
Current Spacings

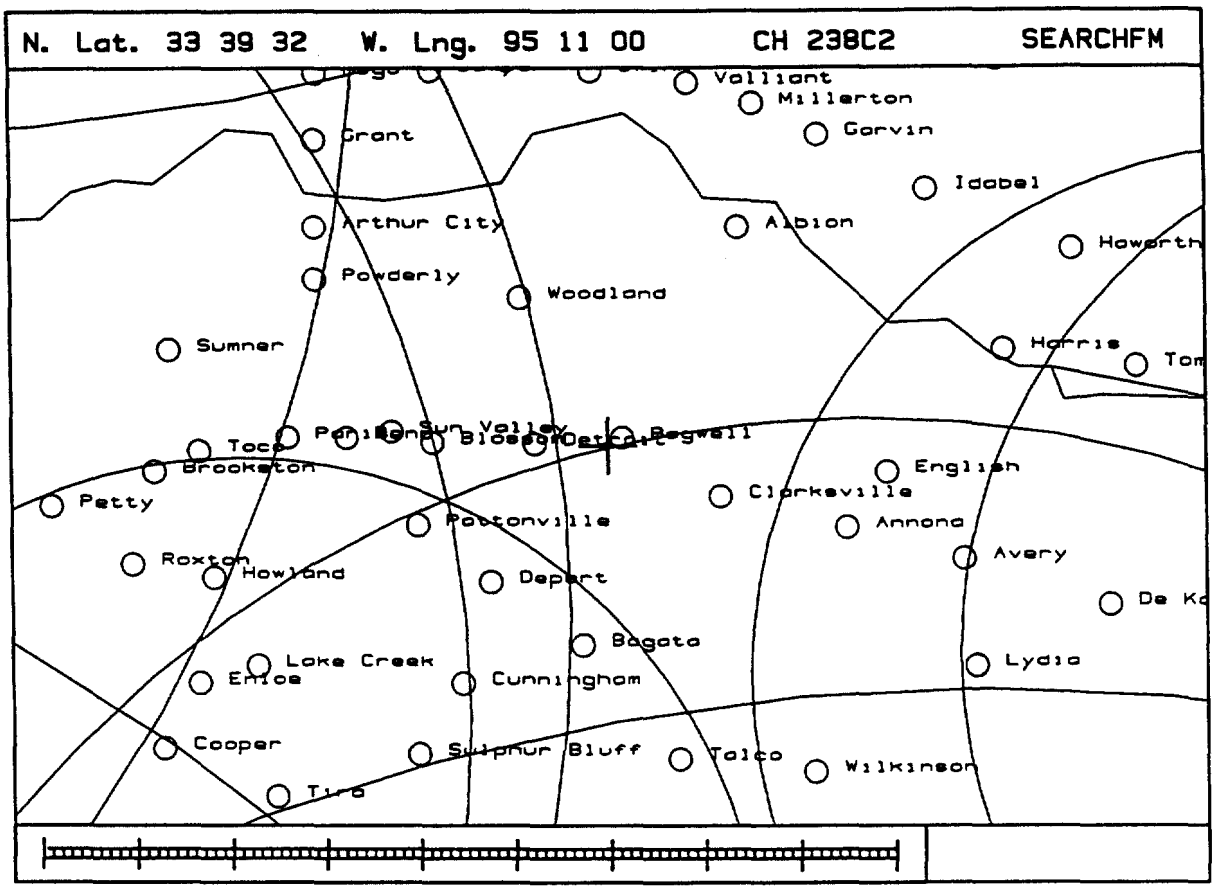
DISPLAY DATES
DATA 01-31-97
SEARCH 02-06-97

Channel 238 - 95.5 MHz

Call	Channel	Location		Dist	Azi	FCC	Margin
N. Lat.	W. Lng.		Power		HAAT		
KFROFM LI	237C3	Gilmer	TX	117.16	166.7	117.0	0.16
32 37 50	94 53 44	ZCN	5.900 kW		203 M		
Curtis Broadcasting Stations,			BLH950814KG		960426		
KHYI.P	237C2	Howe	TX	135.19	262.4	130.0	5.19
33 29 27	96 37 32		50.000 kW		150 M		
Metro Broadcasters-Texas, Inc			BPH960703IA		961017		
KDXE LI	240A	Sulphur Springs	TX	68.47	214.8	55.0	13.47
33 09 07	95 36 12	CN	6.000 kW		87 M		
Gilbert Group, Inc.			BMLH910214KA		960904		
KHYI LI	237C3	Howe	TX	134.71	257.8	117.0	17.71
33 23 43	96 35 56	CN	16.000 kW		126 M		
Metro Broadcasters-Texas, Inc			BLH940429KA		941118		
KEWL.C CPM	236C3	New Boston	TX	75.05	109.0	56.0	19.05
33 26 15	94 25 11	CN	25.000 kW		99 M		
Louis M. Basso III			BMPH941121IB		960730		
KAFXFM LI	238C1	Diboll	TX	252.71	171.0	224.0	28.71
31 24 28	94 45 53	CN	100.000 kW		173 M		
Lovecom of Texas, Inc.			BLH860312KB		960816		
KKAJFM LI	239C1	Ardmore	OK	191.21	285.4	158.0	33.21
34 05 56	97 10 54	CN	100.000 kW		137 M		
Chuckie Broadcasting Company			BLH6267		961218		
KLLI LI	240C3	Hooks	TX	95.55	103.3	56.0	39.55
33 27 25	94 10 59	ZCN	11.500 kW		148 M		
Texarkana Broadcasting, Inc.			BLH930503KC		930816		
KWEN LI	238C	Tulsa	OK	293.62	343.8	249.0	44.62
36 11 46	96 05 53	CY	100.000 kW		405 M		
Newcity Communications of Tul			BLH861021KD		871216		
KCKR LI	238C	Waco	TX	301.87	218.7	249.0	52.87
31 31 16	97 10 26	CN	4.800 kW		55 M		
Gulfstar Communications Waco			BLH961009KE		970113		
KKBI LI	291C2	Broken Bow	OK	74.90	29.4	20.0	54.90
34 14 45	94 46 58	CN	17.000 kW		249 M		
CarePhil Communications			BLH921013KB		940829		

FIGURE 5

E. Harold Munn Jr. & Associates Inc. P.O. Box 220 - Coldwater MI 49036



Alternate Channel - Special Reference Point
Detroit Texas

Call	CH#	Location		D-KM	Azi	FCC	Margin
KFROFM	237C3	Gilmer	TX	117.16	166.7	117.0	0.16
KHYI.P	237C2	Howe	TX	135.19	262.4	130.0	5.19
KDXE	240A	Sulphur Spring	TX	68.47	214.8	55.0	13.47
KHYI	237C3	Howe	TX	134.71	257.8	117.0	17.71
KEWL.C	236C3	New Boston	TX	75.05	109.0	56.0	19.05
KAFXFM	238C1	Diboll	TX	252.71	171.0	224.0	28.71
KKAJFM	239C1	Ardmore	OK	191.21	285.4	158.0	33.21
KLLI	240C3	Hooks	TX	95.55	103.3	56.0	39.55
KWEN	238C	Tulsa	OK	293.62	343.8	249.0	44.62
KCKR	238C	Waco	TX	301.87	218.7	249.0	52.87
KKBI	291C2	Broken Bow	OK	74.90	29.4	20.0	54.90

FIGURE 6

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

Alternate Channel - City Reference Point
Detroit Texas

REFERENCE
33 39 39 N
95 15 58 W

CLASS = C3
Current Spacings
Channel 238 - 95.5 MHz

DISPLAY DATES
DATA 01-31-97
SEARCH 02-06-97

Call	Channel	Location		Dist	Azi	FCC	Margin
N. Lat.	W. Lng.		Power		HAAT		
KHYI.P	237C2	Howe	TX	127.62	261.8	117.0	10.62
33 29 27	96 37 32	CN	50.000 kW		150 M		
Metro Broadcasters-Texas, Inc			BPH960703IA		961017		
KFROFM LI	237C3	Gilmer	TX	119.38	163.1	99.0	20.38
32 37 50	94 53 44	ZCN	5.900 kW		203 M		
Curtis Broadcasting Stations,			BLH950814KG		960426		
KDXE LI	240A	Sulphur Springs	TX	64.57	209.0	42.0	22.57
33 09 07	95 36 12	CN	6.000 kW		87 M		
Gilbert Group, Inc.			BMLH910214KA		960904		
KHYI LI	237C3	Howe	TX	127.26	256.9	99.0	28.26
33 23 43	96 35 56	CN	16.000 kW		126 M		
Metro Broadcasters-Texas, Inc			BLH940429KA		941118		
KEWL.C CPM	236C3	New Boston	TX	82.42	107.3	43.0	39.42
33 26 15	94 25 11	CN	25.000 kW		99 M		
Louis M. Basso III			BMPH941121IB		960730		
KKAJFM LI	239C1	Ardmore	OK	183.76	285.9	144.0	39.76
34 05 56	97 10 54	CN	100.000 kW		137 M		
Chuckie Broadcasting Company			BLH6267		961218		
KAFXFM LI	238C1	Diboll	TX	254.25	169.2	211.0	43.25
31 24 28	94 45 53	CN	100.000 kW		173 M		
Lovecom of Texas, Inc.			BLH860312KB		960816		
KWEN LI	238C	Tulsa	OK	291.35	345.2	237.0	54.35
36 11 46	96 05 53	CY	100.000 kW		405 M		
Newcity Communications of Tul			BLH861021KD		871216		

FIGURE 7

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

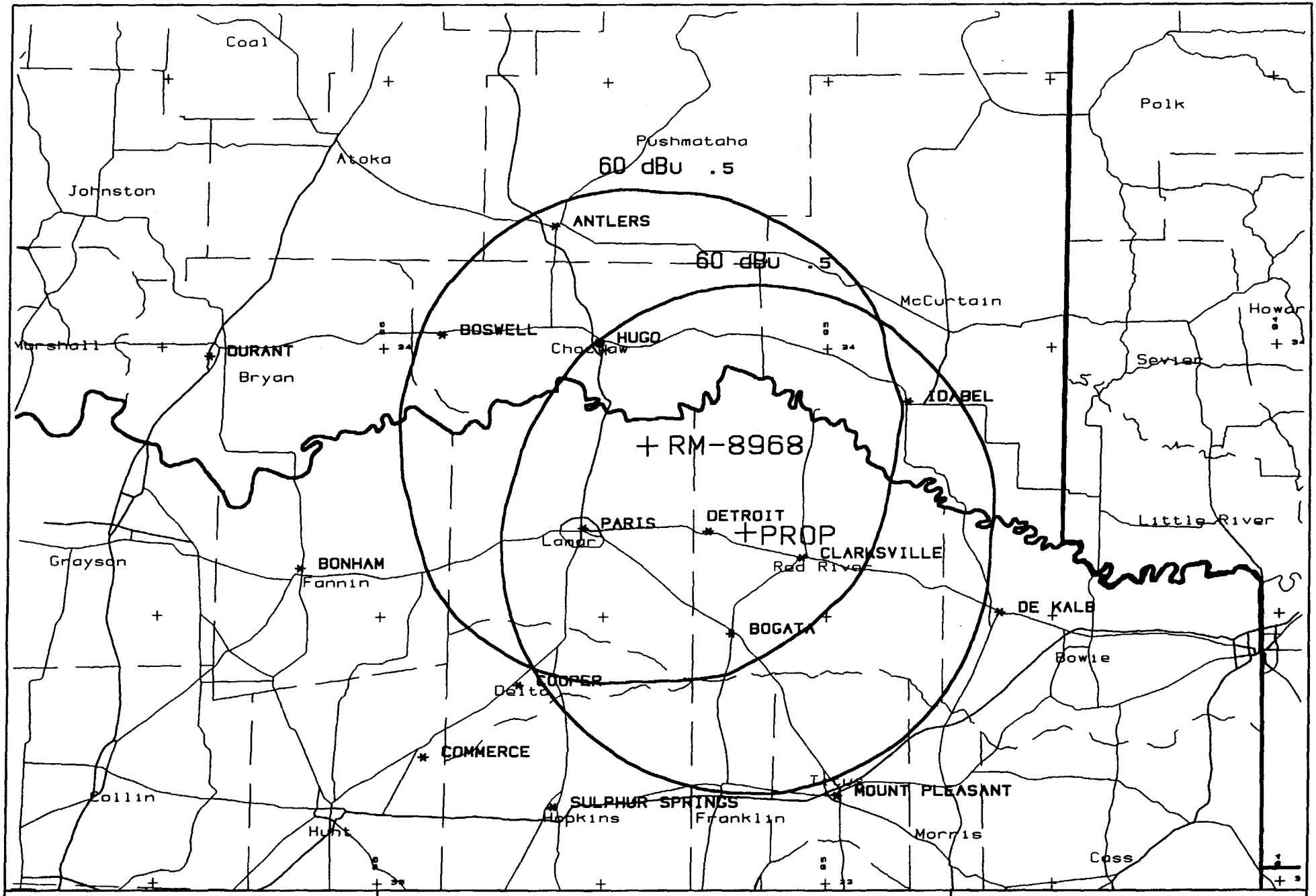
Alternate Channel - City Reference Point
Detroit Texas

REFERENCE
33 39 39 N
95 15 58 W

CLASS = A
Current Spacings
Channel 238 - 95.5 MHz

DISPLAY DATES
DATA 01-31-97
SEARCH 02-06-97

Call	Channel	Location		Dist	Azi	FCC	Margin
N. Lat.	W. Lng.		Power		HAAT		
KHYI.P	237C2	Howe	TX	127.62	261.8	106.0	21.62
33 29 27	96 37 32	CN	50.000 kW		150 M		
Metro Broadcasters-Texas, Inc			BPH960703IA		961017		
KFROFM LI	237C3	Gilmer	TX	119.38	163.1	89.0	30.38
32 37 50	94 53 44	ZCN	5.900 kW		203 M		
Curtis Broadcasting Stations,			BLH950814KG		960426		
KDXE LI	240A	Sulphur Springs	TX	64.57	209.0	31.0	33.57
33 09 07	95 36 12	CN	6.000 kW		87 M		
Gilbert Group, Inc.			BMLH910214KA		960904		
KHYI LI	237C3	Howe	TX	127.26	256.9	89.0	38.26
33 23 43	96 35 56	CN	16.000 kW		126 M		
Metro Broadcasters-Texas, Inc			BLH940429KA		941118		
KEWL.C CPM	236C3	New Boston	TX	82.42	107.3	42.0	40.42
33 26 15	94 25 11	CN	25.000 kW		99 M		
Louis M. Basso III			BMPH941121IB		960730		
KKAJFM LI	239C1	Ardmore	OK	183.76	285.9	133.0	50.76
34 05 56	97 10 54	CN	100.000 kW		137 M		
Chuckie Broadcasting Company			BLH6267		961218		
KAFXFM LI	238C1	Diboll	TX	254.25	169.2	200.0	54.25
31 24 28	94 45 53	CN	100.000 kW		173 M		
Lovecom of Texas, Inc.			BLH860312KB		960816		


Coal
Atoka
Pushmataha
60 dBu .5
Johnston
ANTLERS
60 dBu .5
Polk
McCurtain
Howar
Marshall
DURANT
Bryan
BOSWELL
HUGO
Choctaw
Sevier
IDABEL
+ RM-8968
PARIS
Lamar
DETROIT
+PROP
Little River
Grayson
BONHAM
Fannin
CLARKSVILLE
Red River
DE KALB
BOGATA
Bowie
COOPER
Delta
COMMERCE
Collin
SULPHUR SPRINGS
Hopkins
Franklin
MOUNT PLEASANT
Morris
Hunt
Cass
Scale in km
0 10 20 30 40 50 60 70
RM-8968 294C2 vs Counter-Proposal 238C2
N. Lat. 33 49 16 W. Lng. 95 24 16
FIGURE 8 - DETROIT, TX
MUNN & ASSOC. - 03/97

FIGURE

OTHER SERVICES TO RM-896

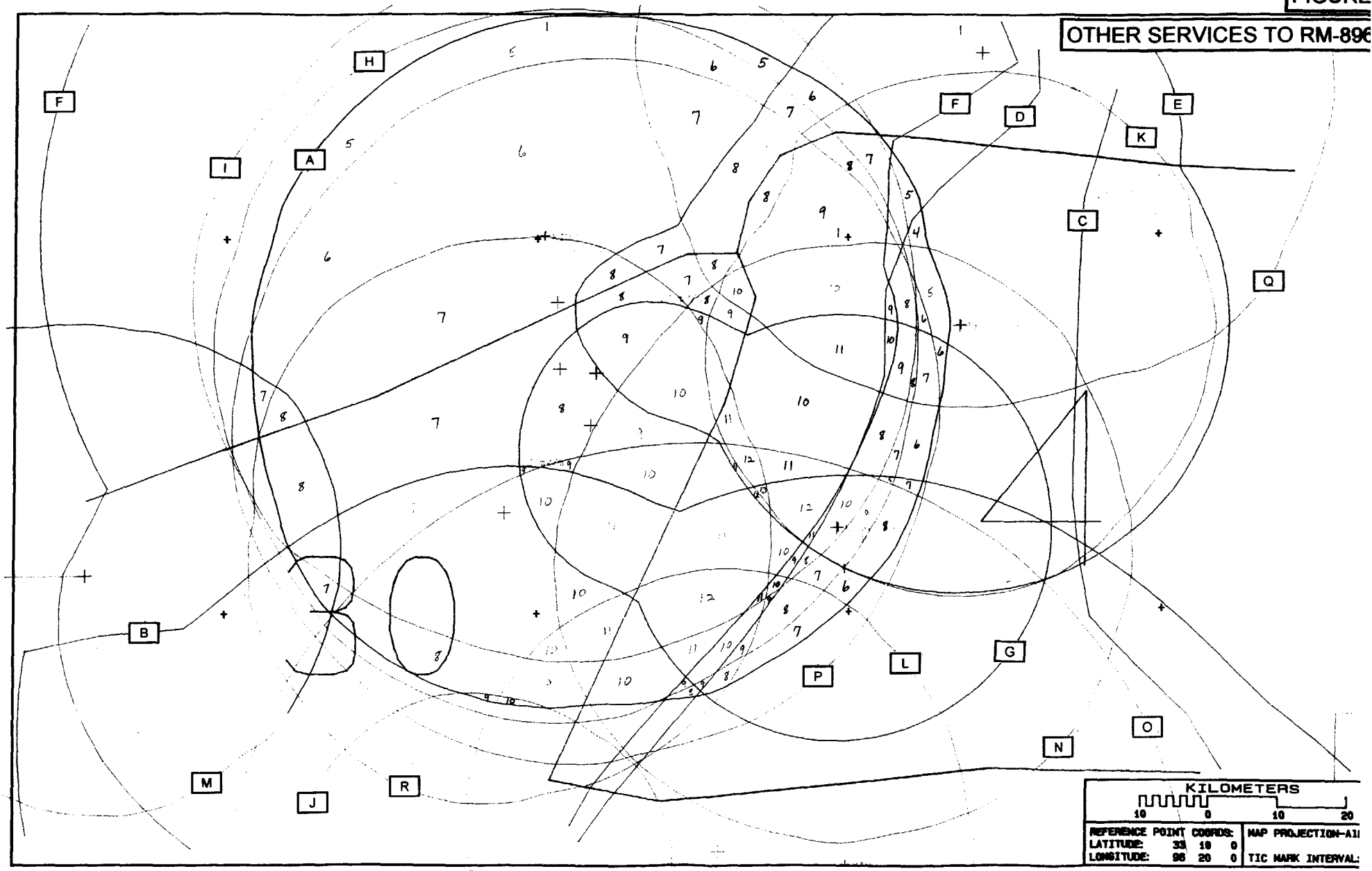


FIGURE 11

OTHER SERVICES TO COUNTER-PROPOSAL

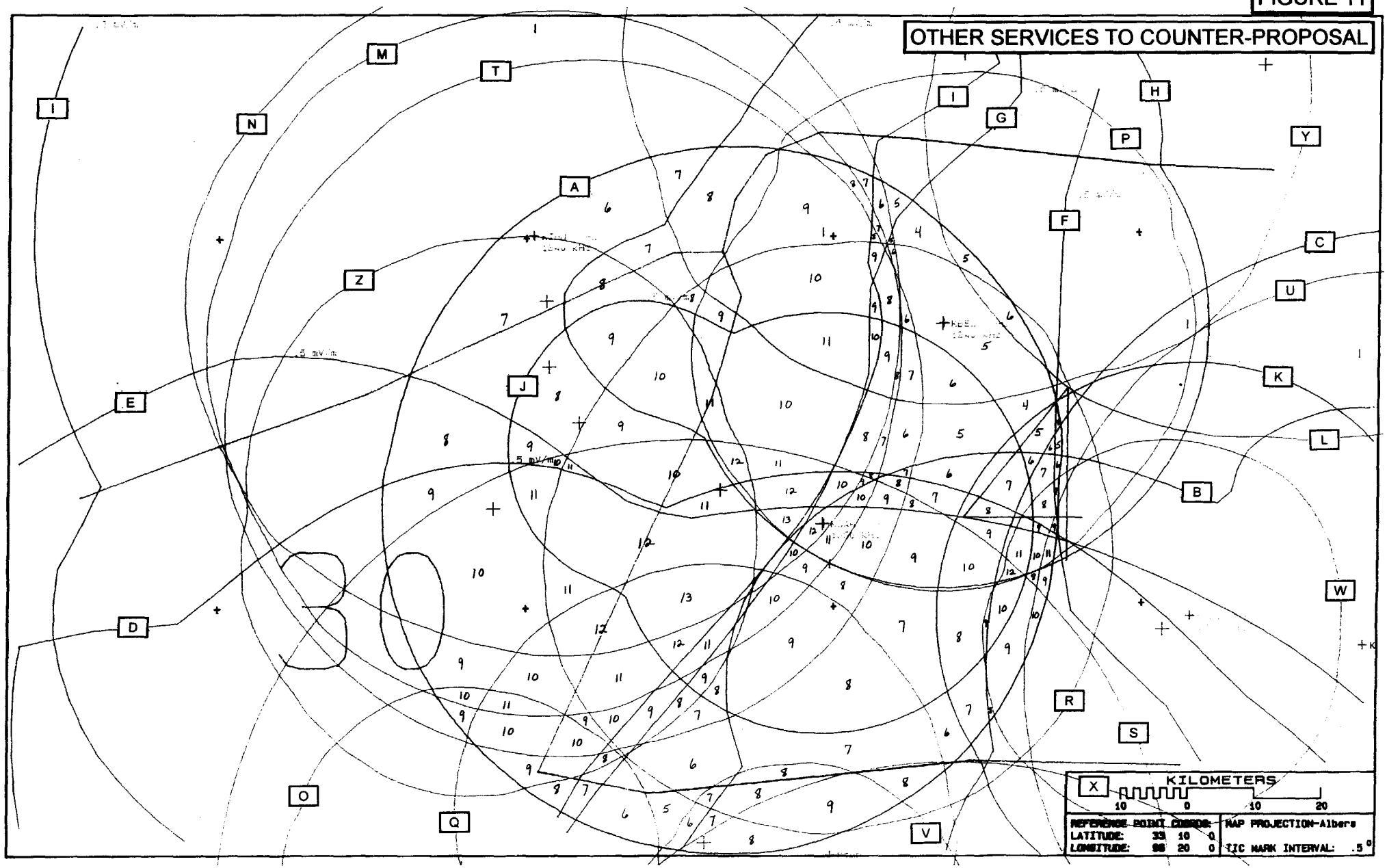


FIGURE 12

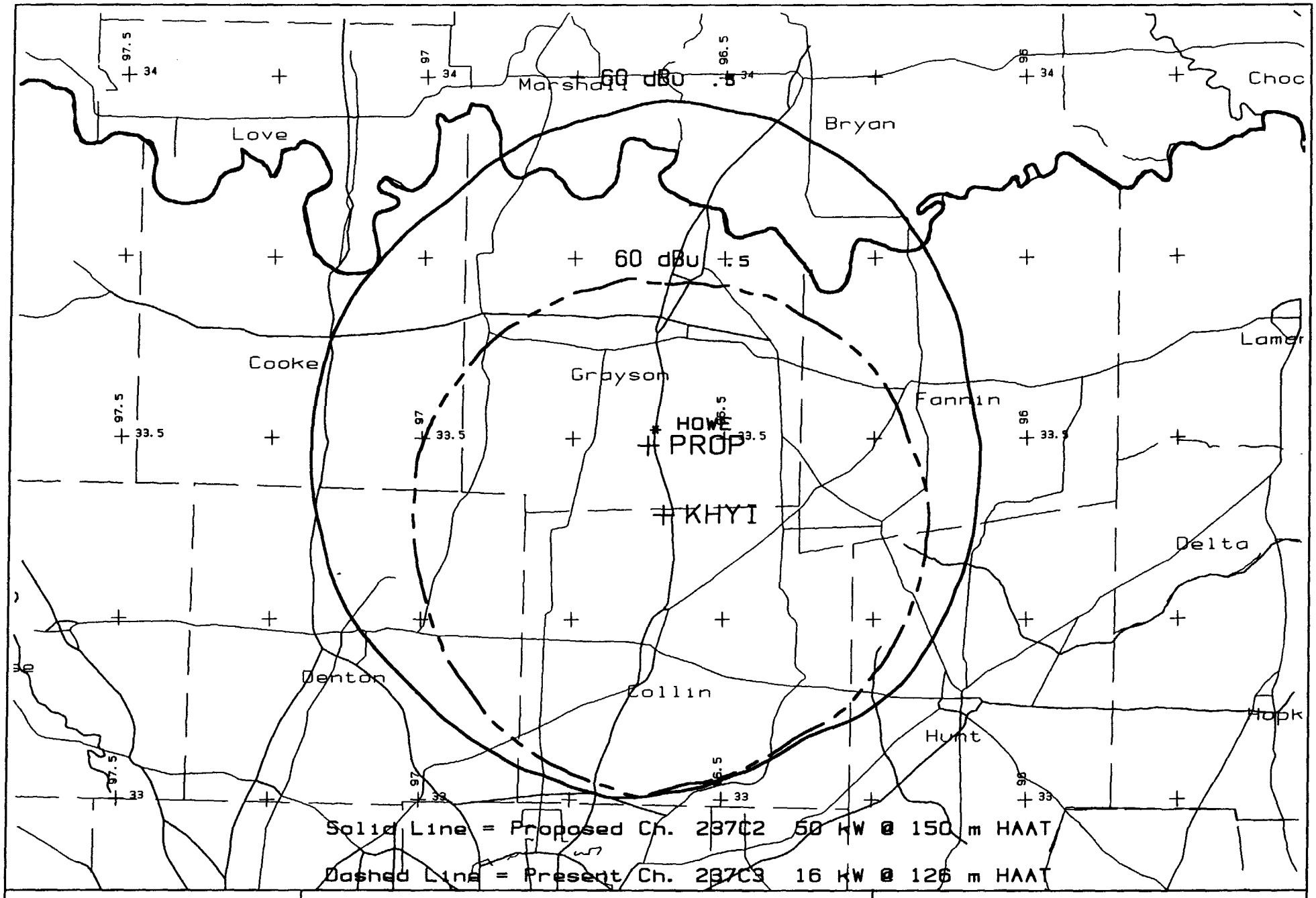
FACILITIES SHOWN IN OTHER SERVICES STUDY FOR CHANNEL 238C2

AM STATIONS

Station Identifier	Call Sign	Frequency (KHz)	Power (kW)	Pattern (DA/NDA)	North Latitude	West Longitude	City	State
B	KCMC	740	1.0	DA	33-26-17	94-08-33	Texarkana	TX
C	KTFS	940	2.5	NDA	33-24-28	94-02-45	Texarkana	TX
D	KIMP	960	1.0	NDA	33-09-54	95-00-27	Mount Pleasant	TX
E	KBNB	1060	10	NDA	32-43-51	95-02-35	Gilmer	TX
F	KRLD	1080	50	NDA	32-53-25	96-38-44	Dallas	TX
G	KEOR	1110	5.0	DA	34-25-08	96-11-24	Atoka	OK
H	KBEL	1240	1.0	NDA	33-52-54	94-49-10	Idabel	OK
I	KIHN	1340	1.0	NDA	34-00-15	95-29-20	Hugo	OK
J	KCAR	1350	0.41	NDA	33-36-47	95-01-03	Clarksville	TX
K	KNBO	1530	2.5	NDA	33-28-56	94-25-25	New Boston	TX

FM STATIONS

Station Identifier	Call Sign	Frequency (MHz)	ERP (kW)	HAAT (meters)	North Latitude	West Longitude	City	State
A	238C2	95.5	50	150	33-39-32	95-11-00	Detroit	TX
L	KDQN-FM	93.1	50	150	34-13-35	94-17-35	De Queen	AR
M	KOYN	93.9	50	150	33-49-36	95-27-49	Paris	TX
N	KITX	95.5	50	150	33-54-56	95-28-04	Hugo	OK
O	KDXE	95.9	6.0	87	33-09-07	95-36-12	Sulphur Springs	TX
P	KBEL-FM	96.7	25.0	91	33-52-54	94-49-10	Idabel	OK
Q	KALK	97.7	22.5	100	33-11-01	95-12-32	Winfield	TX
R	KGAP	98.5	50	94	33-36-47	95-01-03	Clarksville	TX
S	KPXI	100.7	100	300	33-04-36	95-14-26	Mount Pleasant	TX
T	KBUS	101.9	50	150	33-45-04	95-24-51	Paris	TX
U	KKYR-FM	102.5	100	140	33-25-48	94-05-08	Texarkana	TX
V	KXAL-FM	103.1	3.8	100	33-03-43	95-04-36	Pittsburg	TX
W	KZRB	103.5	6.0	100	33-28-00	94-27-48	New Boston	TX
X	KYKX	105.7	100	352	32-35-37	94-49-10	Longview	TX
Y	KKBI	106.1	17.0	249	34-14-45	94-46-58	Broken Bow	OK
Z	KPLT-FM	107.7	35	92	33-38-07	95-33-14	Paris	TX


60 dBu .5
60 dBu .5
Love
Marshall
Bryan
Choc
Cooke
Grayson
Fannin
Lamar
HOWE
PROP
KHYI
Delta
Denton
Collin
Hunt
Hopk
Solid Line = Proposed Ch. 237C2 50 kW @ 150 m HAAT
Dashed Line = Present Ch. 237C3 16 kW @ 126 m HAAT
Scale in km
0 10 20 30 40
UPGRADE COMPARATIVE COVERAGE MAP
N. Lat. 33 29 27 W. Lng. 96 37 32
FIGURE 13 - HOWE, TX
MUNN & ASSOC. - 02/97